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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

**PLAINTIFFS' TWELFTH CONSOLIDATED
 EX PARTE APPLICATION FOR
 APPOINTMENT OF GUARDIANS AD
 LITEM**

*F.S. filed on behalf of minor R.S. v. Meta
 Platforms, Inc. et al, 4:24-cv-04701;*

*A.W. on behalf of A.M. v. Meta Platforms,
 Inc. et al, 4:24-cv-06726;*

*T.P. on behalf of M.P. v. Snap Inc. et al,
 4:24-cv-06730;*

*T.P. on behalf of L.P. v. Meta Platforms, Inc.
 et al., 4:24-cv-06731;*

*S.G., filed on behalf of minor A.G. v.
 ByteDance Inc. et al, 4:24-cv-07429;*

*L.S. individually and on behalf of S.T. v.
 Meta Platforms, Inc. et al, 4:24-cv-07630;*

*K.C. and K.B. v. Meta Platforms, Inc. et al,
 4:24-cv-07663;*

*C.J. and K.J. v. Google LLC et al, 4:24-cv-
 07664;*

1 *S.C. and Z.C. v. Meta Platforms, Inc. et al*,
4:24-cv-07665;

2 *L.C. and B.C. v. TikTok, Inc. et al*, 4:24-cv-
3 07898;

4 *S.B. and A.S. v. TikTok, Inc. et al*, 4:24-cv-
5 07900;

6 *R.D. and B.D. v. TikTok, Inc. et al*, 4:24-cv-
07902;

7 *R.C. individually and on behalf of A.C. v.*
8 *Meta Platforms, Inc. et al*, 4:24-cv-07907;

9 *C.J., individually and on behalf of K.J. v.*
Meta Platforms, Inc. et al, 4:24-cv-07905;

10 *F.D. and S.D. v. Meta Platforms, Inc. et al*,
11 4:24-cv-08626;

12 *J.P. and A.B. v. Meta Platforms, Inc. et al*,
4:24-cv-08628;

13 *P.K. and K.K. v. Meta Platforms, Inc. et al*,
14 4:24-cv-08629;

15 *L.S. individually and on behalf of S.L. v.*
Google LLC et al, 4:24-cv-08639;

16 *M.P. individually and on behalf of E.P. v.*
17 *Meta Platforms, Inc. et al*, 4:24-cv-08645;

18 *S.W. and Z.T. v. Meta Platforms, Inc. et al*,
4:24-cv-08648;

19 *J.W. individually and on behalf of M.B. v.*
20 *Snap, Inc. et al*, 4:24-cv-08651;

21 *I.W. and E.W. v. Snap, Inc. et al*, 4:24-cv-
08653;

22 *J.T. and A.M. v. Meta Platforms, Inc. et al*,
23 4:24-cv-08670;

24 *D.C. and D.W. v. Google LLC et al*, 4:24-cv-
08686;

25 *R.C. individually and on behalf of C.R. v.*
26 *Google LLC et al*, 4:24-cv-08687;

27 *T.G. individually and on behalf of J.D. v.*
Meta Platforms, Inc. et al, 4:24-cv-08693;

28 *H.C., by and through Amber Humphrey,*

1 3:24-cv-08732;

2 *A.O. and A.S. v. Meta Platforms, Inc. et al*,
3 4:24-cv-08813;

4 *D.G. and F.G. v. Meta Platforms, Inc. et al*,
5 4:24-cv-08817;

6 *P.L. and S.L. v. Meta Platforms, Inc. et al*,
7 4:24-cv-08819;

8 *F.A. and L.G. v. Meta Platforms, Inc. et al*,
9 4:24-cv-08882;

10 *HM and GM v. Meta Platforms, Inc. et al*,
11 4:24-cv-08884.

12 APPLICATION

13 Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians
14 *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby
15 submits Plaintiffs’ Twelfth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad*
16 *Litem* (“*Ex Parte* Application”) for this Court’s consideration.

17 “Fit parents are presumed to act in the best interests of their children.” *J.B. by &*
18 *Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021
19 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000);
20 *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-
21 RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party
22 to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the
23 parent as guardian ad litem upon receipt of an ex parte application without exercising much
24 discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed
25 guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL
26 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-
27 01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v.*
28 *Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal. Sept.
16, 2016). However, “[w]hen there is a potential conflict between a perceived parental
responsibility and an obligation to assist the court in achieving a just and speedy determination of

the action, a court has the right to select guardian ad litem who is not a parent if that guardian would best protect the child's interests." *J.M.*, 2016 WL 4942999, at *1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibits 1-32 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Twelfth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Decl." or "Anderson Declaration") are the *Ex Parte* Applications for Appointment of Guardians *Ad Litem* ("Applications") submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases.

- *F.S. filed on behalf of minor R.S. v. Meta Platforms, Inc. et al*, 4:24-cv-04701 (Exhibit 1);
- *A.W. on behalf of A.M. v. Meta Platforms, Inc. et al*, 4:24-cv-06726 (Exhibit 2);
- *T.P. on behalf of M.P. v. Snap Inc. et al*, 4:24-cv-06730 (Exhibit 3);
- *T.P. on behalf of L.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-06731 (Exhibit 4);
- *S.G., filed on behalf of minor A.G. v. ByteDance Inc. et al*, 4:24-cv-07429 (Exhibit 5);
- *L.S. individually and on behalf of S.T. v. Meta Platforms, Inc. et al*, 4:24-cv-07630 (Exhibit 6);
- *K.C. and K.B. v. Meta Platforms, Inc. et al*, 4:24-cv-07663 (Exhibit 7);
- *C.J. and K.J. v. Google LLC et al*, 4:24-cv-07664 (Exhibit 8);
- *S.C. and Z.C. v. Meta Platforms, Inc. et al*, 4:24-cv-07665 (Exhibit 9);
- *L.C. and B.C. v. TikTok, Inc. et al*, 4:24-cv-07898 (Exhibit 10);
- *S.B. and A.S. v. TikTok, Inc. et al*, 4:24-cv-07900 (Exhibit 11);
- *R.D. and B.D. v. TikTok, Inc. et al*, 4:24-cv-07902 (Exhibit 12);
- *R.C. individually and on behalf of A.C. v. Meta Platforms, Inc. et al*, 4:24-cv-07907 (Exhibit 13);
- *C.J., individually and on behalf of K.J. v. Meta Platforms, Inc. et al*, 4:24-cv-07905 (Exhibit 14);

- 1 • *F.D. and S.D. v. Meta Platforms, Inc. et al*, 4:24-cv-08626 (Exhibit 15);
- 2 • *J.P. and A.B. v. Meta Platforms, Inc. et al*, 4:24-cv-08628 (Exhibit 16);
- 3 • *P.K. and K.K. v. Meta Platforms, Inc. et al*, 4:24-cv-08629 (Exhibit 17);
- 4 • *L.S. individually and on behalf of S.L. v. Google LLC et al*, 4:24-cv-08639 (Exhibit 18);
- 5 • *M.P. individually and on behalf of E.P. v. Meta Platforms, Inc. et al*, 4:24-cv-08645
- 6 (Exhibit 19);
- 7 • *S.W. and Z.T. v. Meta Platforms, Inc. et al*, 4:24-cv-08648 (Exhibit 20);
- 8 • *J.W. individually and on behalf of M.B. v. Snap, Inc. et al*, 4:24-cv-08651 (Exhibit 21);
- 9 • *I.W. and E.W. v. Snap, Inc. et al*, 4:24-cv-08653 (Exhibit 22);
- 10 • *J.T. and A.M. v. Meta Platforms, Inc. et al*, 4:24-cv-08670 (Exhibit 23);
- 11 • *D.C. and D.W. v. Google LLC et al*, 4:24-cv-08686 (Exhibit 24);
- 12 • *R.C. individually and on behalf of C.R. v. Google LLC et al*, 4:24-cv-08687 (Exhibit 25);
- 13 • *T.G. individually and on behalf of J.D. v. Meta Platforms, Inc. et al*, 4:24-cv-08693
- 14 (Exhibit 26);
- 15 • *H.C., by and through Amber Humphrey*, 3:24-cv-08732 (Exhibit 27);
- 16 • *A.O. and A.S. v. Meta Platforms, Inc. et al*, 4:24-cv-08813 (Exhibit 28);
- 17 • *D.G. and F.G. v. Meta Platforms, Inc. et al*, 4:24-cv-08817 (Exhibit 29);
- 18 • *P.L. and S.L. v. Meta Platforms, Inc. et al*, 4:24-cv-08819 (Exhibit 30);
- 19 • *F.A. and L.G. v. Meta Platforms, Inc. et al*, 4:24-cv-08882 (Exhibit 31);
- 20 • *HM and GM v. Meta Platforms, Inc. et al*, 4:24-cv-08884 (Exhibit 32).

21 Exhibits 1-32 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison
 22 Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the
 23 Anderson Declaration as Exhibits 1-32 are consistent with Attachment A to this Court's Guardian
 24 *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information

(including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Anderson Decl. ¶ 35.

Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or legal guardians in the cases listed above are deemed presumptively approved upon filing, as there is no apparent conflict between the applicants' parental responsibility and their obligation to assist the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is filed. ECF No. 122 ¶ 5. The objection period will close on January 7, 2025.

Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: December 23, 2024

Respectfully submitted,

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/s/ Jennie Lee Anderson

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